

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MOBIL CERRO NEGRO, LTD.

Plaintiff,

v.

PDVSA CERRO NEGRO S.A.

Defendant.

Civil Action No. _____

AFFIDAVIT IN SUPPORT
OF MOTION TO ADMIT
MICHAEL J. BARATZ
PRO HAC VICE

MICHAEL MILLER states as follows:

1. I am a member of the Bar of this Court and of the firm of Steptoe & Johnson LLP.

I make this affidavit in support of plaintiff Mobil Cerro Negro Ltd.'s motion for the admission of Michael J. Baratz, Esq. to practice *pro hac vice* as counsel for Plaintiff in the above-captioned case.

2. Mr. Baratz is a member of the firm of Steptoe & Johnson LLP, resident in our District of Columbia office. Mr. Baratz is a member in good standing of the Bars of the District of Columbia and the State of Maryland. (A certified copy of Mr. Baratz's certificate of good standing in the Bar of the District of Columbia is annexed hereto as Exhibit 1; a certified copy of Mr. Baratz's certificate of good standing in the Bar of the State of Maryland is annexed hereto as Exhibit 2.) Mr. Baratz has advised me that he is familiar with the Federal Rules of Civil Procedure and with the Local Rules of this Court.

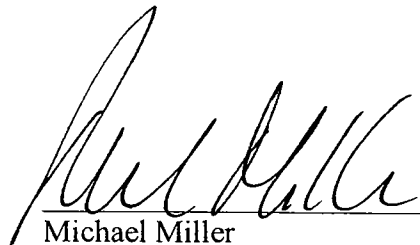
3. In addition, I have worked with Mr. Baratz and I can personally attest that he is competent and of good character.

4. There are no pending disciplinary proceedings against Mr. Baratz in any State or Federal Court.

5. Wherefore, I respectfully request that Michael J. Baratz, Esq., be admitted to practice *pro hac vice* as counsel for plaintiff Mobil Cerro Negro Ltd. in the above-captioned case.

6. Pursuant to 28 U.S.C.A. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 27, 2007
New York, New York

A handwritten signature in black ink, appearing to read "Michael Miller", is written over a horizontal line.

Michael Miller
STEPTOE & JOHNSON LLP
750 Seventh Avenue
New York, New York 10019
(212) 506-3900

Attorney for Plaintiff Mobil Cerro Negro, Ltd.

EXHIBIT 1



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

MICHAEL JEREMY BARATZ

was on the 11TH day of JULY, 2003

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on December 20, 2007.

GARLAND PINKSTON, JR., CLERK


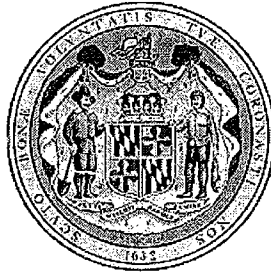
By: 
Deputy Clerk

EXHIBIT 2

**Court of Appeals
of Maryland**
Annapolis, MD



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the seventeenth day of December, 2002,*

Michael Jeremy Baratz

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twentieth day of December, 2007.*


Clerk of the Court of Appeals of Maryland